

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - REVISED

PERMITTEE

Huck Store Fixture Company  
Attn: Doug Olson  
1100 North 28th  
Quincy, Illinois 62301

Application No.: 90050036  
Applicant's Designation:  
Subject: Wood Furniture Manufacturing  
Date Issued: November 21, 2002  
Location: 1100 North 28th, Quincy

I.D. No.: 001065AFU  
Date Received: November 7, 2002  
Expiration Date: September 23, 2007

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of seven paint spray booths each with an air filtration system, two curtain coaters, and a glue spreader as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons per year of volatile organic material (VOM), 25 tons per year of combined hazardous air pollutants (HAP), and 10 tons per year of single HAP). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits issued for this location.
2. Emissions and operation of equipment, including clean-up, shall not exceed the following limits:

<u>Item of Equipment</u>	<u>Coating Usage</u>		<u>VOM Usage and Emissions</u>	
	<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Seven Spray Paint Booths	1,826	18,294	4.9	48.8
Glue Spreader	9,522	95,221	0.24	2.4
Two Curtain Coaters	728	7,280	2.0	20.0
			Total	71.2

These limits are based on maximum usage rates of coatings and glue, maximum hours of operation, and average VOM contents. Compliance with annual limits shall be determined from a running total of the previous 12 months of data.

3. The VOM content for each coating as applied in the seven spray paint booths and two curtain coaters shall not exceed the following:

	<u>(Lb/Gallon)</u>
Clear Topcoat	5.6
Opaque Stain	4.7
Pigmented Coat	5.0
Repair Coat	5.6
Sealer	5.6
Semi-Transparent Stain	6.6
Wash Coat	6.1

pursuant to 35 Ill. Adm. Code 215.204(L).

4. Emissions and operation of equipment shall not exceed the following limits:

<u>Item of Equipment</u>	<u>Particulate Matter Emissions (Tons/Month)</u>	<u>(Tons/Year)</u>
Seven Spray Paint Booths	0.2	1.7
One Glue Spreader	0.05	0.44
Two Curtain Coaters	0.24	<u>2.4</u>
	Total	4.5

These limits are based on the average solids content of coatings (1.29 lb/gallon), a 50% coating solids emission rate, and collection efficiencies for the spray booth (71.25%). Compliance with annual limits shall be determined from a running total of the previous 12 months of data.

5. No person shall cause or allow any visible emissions of fugitive particulate matter from any process, including any material handling or storage activity beyond the property line of the emission source, pursuant to 35 Ill. Adm. Code 212.301.
6. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the pollution control equipment covered under this permit such that the pollution control equipment be kept in proper working condition and not cause a violation of the Environmental Protection Act or regulations promulgated therein.
7. In the event that the operation of this source results in an odor nuisance the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.
- 8a. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish in a rule which would

require the Permittee to obtain a CAAPP permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.

- b. Note that there is a "nested" limit on the emissions of HAPs as a result of the limit on VOM emissions. The HAPs emitted at this source have been determined to be VOM and therefore limiting VOM emissions also limits HAP emissions.
- 9a. The Permittee shall maintain the following daily records:
  - i. The name and identification number of each coating as applied;
  - ii. The calculations of VOM and HAPs emissions per volume of paint and glue (minus water and any compounds which are specifically exempted from the definition of VOM) as applied (lb/gal);
- b. The Permittee shall maintain the following monthly records:
  - i. The name and identification number of each coating used;
  - ii. The usage (gal/month), density (lb/gal), VOM and HAP content of each coating (weight percent or lb/gal);
  - iii. The name and identification number of solvents used;
  - iv. The usage (gal/month), density (lb/gal), VOM and HAP content of each solvent (weight percent or lb/gal);
  - v. The usage (gal/month) and VOM and HAP content of glue (wt. % or lb/gal);
  - vi. Separate emission records for each individual HAP with emission rate exceeding 0.5 tons/month; and
  - vii. The VOM and HAP emission calculations for the current month and total running for last 12 months (ton/month and ton/yr).
- c. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
- 10. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report

shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

11. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year: The name, volume used (gal/year), VOM and HAP content of each material used.
12. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Compliance Section (#40)  
1340 North Ninth Street  
P.O. Box 19276  
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
5415 North University  
Peoria, Illinois 61614

Please note that all woodworking operations are exempt from state permitting requirements, pursuant to 35 Ill. Adm. Code 201.146(aa).

Please also note that all references to the boiler have been removed from this permit.

If you have any questions on this, please call Randy Solomon at 217/782-2113.

Donald E. Sutton, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

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cc: Illinois EPA, FOS Region 2  
Illinois EPA, Compliance Section  
Lotus Notes

### Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from this wood furniture manufacturing plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. This scenario is maximum operating hours and material usage from the spray paint booths, glue spreader and 2 curtain coaters. The resulting maximum emissions are below the levels, e.g., 100 tons per year of VOM, 25 tons per year of combined HAPs, and 10 tons per year of single HAPs at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled, equipment operating hours are lower, and control measures are more effective than required in this permit.

1. Emissions and operation of equipment, including clean-up, shall not exceed the following limits:

<u>Item of Equipment</u>	<u>Coating Usage (Gal/Mo)</u>	<u>Usage (Gal/Yr)</u>	<u>VOM Usage and Emissions (Tons/Mo)</u>	<u>(Tons/Yr)</u>
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These limits are based on maximum usage rates of coatings and glue, maximum hours of operation, and average VOM contents. Compliance with annual limits shall be determined from a running total of the previous 12 months of data.

- 2a. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish in a rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.
- b. Note that there is a "nested" limit on the emissions of HAPs as a result of the limit on VOM emissions. The HAPs emitted at this source have been determined to be VOM and therefore limiting VOM emissions also limits HAP emissions.

3. Emissions and operation of equipment shall not exceed the following limits:

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